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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,) CASE NO. 13-CR-93 JST
v.)
JONATHAN MOTA) STIPULATION WITH RESPECT TO TRIAL AND
Defendant) PRETRIAL SCHEDULE AND [PROPOSED]
) ORDER
)
)
)

The parties appeared before the Honorable Jon S. Tigar on December 2, 2013 for a hearing to set dates. Assistant U.S. Attorneys Kathryn Haun and William Frentzen represented the United States, and Richard B. Mazer, Esq. represented the defendant. The government requested a trial date in either February or March 2014. Among other reasons, the government stated that it was in the public's interest, including the victim's family's interest, to have as speedy a trial as possible. Defense counsel opposed the setting of a trial date in early 2014 due to commitments with other cases, including a case set for trial before Judge Illston in April and May 2014. The Court set forth several factors it typically considers in setting a trial date, and the parties agreed to meet and confer and see if they could arrive at a

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1 proposed schedule that would suit both sides.

2 The parties have met and conferred and have arrived at a proposed stipulated schedule for the
3 following trial and pretrial dates. The following schedule presumes an **October 6, 2014** trial date.
4 Unless otherwise noted below, these deadlines are reciprocal and apply to each side.

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6 **August 1, 2014** Government produces materials necessary for defense reply to outstanding FRE
7 404(b) and severance motions

8 **August 22, 2014** Defense files replies, if any, to government's previously-filed oppositions to
9 defendant's Motion to Preclude FRE 404(b) Evidence and defendant's Motion to Sever

10 **September 5, 2014** Deadline for filing any additional Motions in Limine

11 **September 6, 2014** Case-in-chief disclosures for experts due

12 **September 12, 2014** Deadline for filing any Oppositions to Motions in Limine

13 **September 17, 2014** Deadline for filing any replies to Motions in Limine

14 **September 19, 2014** Hearing date before the Court on defendant's Motion to Preclude FRE 404(b)
15 Evidence and defendant's Motion to Sever, as well as Motions in Limine

16 **September 26, 2014** Deadline for production of Jencks/Giglio materials that exist at the time and
17 witness and exhibit lists due

18 **September 29, 2014** Pretrial conference

19 **October 6, 2014** Jury selection and trial begins

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2 The parties are set to appear before the Court on Monday, December 9, 2013, at which the
3 parties presume the foregoing will be discussed. Nonetheless, a Proposed Order is attached in the event
4 that following the December 9, 2013 hearing, the Court adopts the instant Stipulated Schedule. Finally,
5 the parties jointly suggest that an additional two status conferences would be appropriate in early and
6 mid 2014 to address any issues and/or discovery matters.

7 SO STIPULATED.
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/s/

9 December 6, 2013
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KATHRYN R. HAUN
WILLIAM FRENTZEN
Assistant U.S. Attorneys

11 December 6, 2013
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RICHARD MAZER
MARK GOLDROSEN
Attorneys for Defendant

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16 IT IS SO ORDERED.
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18 DATED: December 9, 2013
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24 JON S. TIGAR
25 United States District Court Judge
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